

Exhibit A

CHALLENGED TESTIMONY ON PLAINTIFF'S MOTION *IN LIMINE* PART C

Eastern challenges the following testimony:

Ex. F, Dep. Tr. of Sasha Gong at 15:21-16:12, 29:20-33:09, 39:12-40:15, 54:23-78:08, 93:01-96:10, 114:10-116:03, 124:04-17, 134:02-17, 139:14-142:14, 151:06-153:04, 157:13-157:20, 158:09-171:02, 175:10- 187:04; Ex. B, Waller II at 31:20-55:19. All of this is fact testimony. Ex. F, Dep. Tr. of Sasha Gong at 15:21-16:12 (Gong did not sever ties with the protest movement in China after coming to the United States; there is such a thing as a Chinese dissident movement in the United States), 29:20-33:09 (Gong first met Guo while she was covering his expose in 2016), 39:12-40:15 (describing the Voice of America broadcast controversy), 54:23-78:08 (Guo's history and relationships before coming to America; Guo did not speak out as a dissident when he first came to America; Guo told Gong he thought President Xi was a good leader; Guo told Gong about his business relationship with William Je), 93:01-96:10 (Gong's knowledge of John Thornton and Steve Bannon's trip to Beijing in 2017), 114:10-116:03 (Gong's knowledge of Yvette Wang's background), 124:04-17 (the Chinese government does not allow Hong Kong companies to transfer money to dissidents), 134:02-17 (people have told Gong that they think Guo is a liar and a bad person who should not have access to Bannon), 139:14-142:14 (Gong's knowledge of Guo's litigation against the dissident community; the dissident community's fear of Guo because of his ongoing relationship with Chinese intelligence), 151:06-153:04 (Guo's ongoing relationship with Chinese intelligence; Guo's attacks on Professor Zhou), 157:13-157:20 (Guo's public interaction with members of the China hawk community has negatively affected their credibility), 158:09-171:02 (China surveils communications between Mainlanders and dissidents; Gong recognized the man in the video pledging total submission to Chinese Communist leadership as Guo; Guo refrained from criticizing top CCP leaders), 175:10- 187:04 (Gong had suspicions about Guo; Gong did not know about Guo's control over the Rule of Law

Society when she became its director; Gong resigned when she learned of Guo's involvement; Gong helped spread Guo's anti-corruption message even though she suspected Guo of being part of the corruption), Ex. B, Waller II at 31:20-55:19 (an audio recording from March 5, 2017 shows Guo denouncing dissidents and pledging support to the CCP; in May 2017 Guo met with 16 senior Chinese Communist Party and secret police officials; on August 26, 2017, Guo signed a letter professing his subservience to Xi Jinping; Guo waged a vexatious litigation campaign to harass Chinese dissidents and democracy activists; Guo made numerous public statements that he published on Guo Media and Voice of Guo pronouncing his loyalty to Xi Jinping and calling him a gift from God; Guo owes his entire business success to the Chinese secret police; Guo continues to show affection for former vice minister of state security Ma Jian; Guo is not a defector; Yeliang Xia told Waller that Guo was a Chinese spy; the Chinese dissidents Waller knows do not engage in this kind of behavior). Eastern also cites Ex. B, Waller II at 11:14-125:18, which appears to be a drafting error.